

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: KERRY A. PELLISH
DARBY JO PELLISH
Debtors**

**: CASE NO.: [1:14-bk-03123-MDF](#)
:
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JOINT DEBTOR'S MOTION TO TERMINATE WAGE ATTACHMENT

AND NOW COMES, Joint Debtor, Darby Jo Pellish, by and through her attorneys, Jacobson, Julius & Harshberger, who hereby files this Motion to Terminate Wage Attachment and in support thereof states:

1. Joint Debtor filed a Chapter 13 Petition on July 2, 2014.
2. This honorable court approved a wage attachment of Joint Debtor's wages on November 20, 2014 and further directed the Partner's in Women's Healthcare to withhold funds from Joint Debtor's wages to pay the Chapter 13 Trustee.
3. Debtor files this motion seeking an order terminating said wage attachment because the case is now complete and no further payments are due to the Chapter 13 Trustee.

WHEREFORE, Joint Debtor respectfully requests that this Court enter an order directing the above-mentioned employer to terminate the payments to the Chapter 13 Trustee.

Respectfully Submitted,

JACOBSON, JULIUS AND HARSHBERGER

Dated: July 22, 2019

s/ Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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DARBY JO PELLISH	:
Debtors	:

PROOF OF SERVICE

AND NOW, this 22nd day of July, 2019, I, Colleen Reed, with Jacobson, Julius & Harshberger, attorneys for the Joint Debtor, hereby certify that on this day I served the within *Motion to Terminate Wage Attachment* upon the following persons by forwarding the same via CM/ECF and/or first class mail—

Charles J. DeHart, III, Esq.
8125 Adams Drive
Hummelstown, PA 17036

Office of U.S. Trustee
P.O.B. 969
Harrisburg, PA 17108.0969

Attn: Karen Kissinger
Partners in Women's Healthcare
One Lemoyne Square Plaza
Suite 201
Lemoyne, PA 17043

By: s/Colleen Reed
Colleen Reed

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DARBY JO PELLISH	:
Debtors	:

UPON CONSIDERATION of the above-referenced Joint Debtor having filed a *Motion to Terminate Wage Attachment* under Chapter 13 of the Bankruptcy Code;

IT IS HEREBY ORDERED that the Motion is GRANTED and that the entity from whom Debtor receives income:

Attn: Karen Kissinger
Partners in Women's Healthcare
One Lemoyne Square Plaza
Suite 201
Lemoyne, PA 17043

shall terminate all deductions and wage attachments remitted to Chapter 13 Trustee, Charles J. Dehart, II, from said Joint Debtor's income, previously ordered by this Honorable Court on November 20, 2014.